

8 May 1972

MEMORANDUM FOR THE RECORD

SUBJECT: Environmental Impact Studies

1. The whole question of environmental impact tends to get confused in bureaucratic semantics.
2. These studies are required in connection with any activity on the part of a Government agency which will result in a significant disturbance of surrounding ecology. Prime examples are a construction project or a master plan. Components within the Agency having responsibility would be the Real Estate and Construction Division and the Building Planning Staff of the Office of Logistics.
3. The environmental impact statement is the formal procedure prepared to Council on Environmental Quality (CEQ) guidelines and processed formally as required by CEQ. Other Government agencies and the public ordinarily will have access to this statement and the CEQ or the Environmental Protection Agency (EPA) will insert their comments on the statement (either a draft or final statement) in the Federal Register. Copies of comments by EPA and CEQ are attached. The National Capital Planning Commission (NCPC) requires the submission of either an environmental impact statement or an environmental impact description prior to the presentation of a master plan, master plan modification, or construction project. Ordinarily, the NCPC will circulate such a statement or description to other interested Government entities for review. For example, in the case of Headquarters, this would include the Fairfax County Planning Commission and the Northern Virginia Regional Planning Commission. In order for a master plan or a construction project to be finally approved, it appears that one of two things are required: either (a) a formal environmental statement approved under the formal procedures or, alternatively, (b) a determination made by a responsible high authority within the Agency that a formal environmental impact statement is not necessary. Ordinarily such a determination, if properly prepared, will not be challenged. The CEQ guidelines for preparation of a statement embrace five categories; i.e., environmental impact, adverse effect, long-term effect, short-term effect, and alternatives. If there is no feasible alternative to the course under consideration, such should be stated.
4. Contact with GSA (Dick Pronk, telephone 183-6147) revealed they are handling environmental impact studies in a number of ways. He advised that the

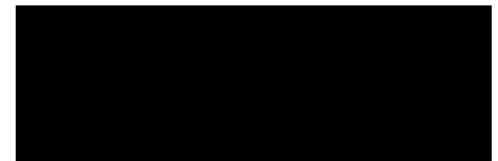
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word statement in the phrase connotes a degree of formality sometimes not intended by the parent agency. Alternative words to use instead of the word statement would be description or analysis. While obviously a matter of semantics, the connotation seems to be that these words denote a more informal approach to the environmental impact study. On new work, GSA handles the environmental impact study as part of the design contract and the A&E firm is responsible for preparing either the statement or the determination that a statement is not required. On-going work may be covered by GSA writing the statement or making the determination or, in some cases, the parent agencies will do their own. In any event, the parent agency bears the responsibility for filing either the determination or the statement with NCPC.

5. In the early stages of a master plan, the plan would be called preliminary and the environmental study would be termed a description or analysis to differentiate from the more formalized statement. In any case, a final master plan will have to be accompanied by a formal environmental impact statement or a determination that such statement is not required prior to formal approval by NCPC.

6. I am advised that the preparation of an environmental impact statement for a small job would be in the neighborhood of \$200 to \$3,000 and, in the 15 to 50 million dollar category, the job would be between \$5,000 to \$15,000.

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Chief,  
Building Planning Staff, OL

Att.